

October 19, 2006

File 06816.0060

The Honorable Edward M. Chen  
United States Magistrate Judge  
United States District Court  
Northern District of California  
450 Golden Gate Avenue  
San Francisco CA 94012

Re: *Synopsys v. Ricoh Company, Ltd.*,  
Case No. C03-2289 MJJ (EMC)  
*Ricoh Company, Ltd. v. Aeroflex, Inc., et al.*,  
Case No. C03-4669 MJJ (EMC)

Dear Judge Chen:

We have received Ricoh's October 16, 2006 letter request for reconsideration or, in the alternative, modification of the Court's Order of October 4, 2006.

Synopsys and the Customer Defendants strongly disagree with Ricoh's characterization of the parties' meet and confer (which concluded on October 9, 2006) and Ricoh's arguments in support of its request for reconsideration or, in the alternative, modification of the Court's Order – all of which could have been presented by Ricoh in opposition to Synopsys' and Customer Defendants' original motion to compel. Synopsys and Customer Defendants believe that Ricoh's request is procedurally and substantively flawed.

However, given Judge Jenkins' recent continuance of the trial of this matter from November 28, 2006 to March 12, 2007, Synopsys and Customer Defendants are agreeable to accepting a modification of the Court's Order of October 4, 2006 to require Ricoh to produce Dr. Kobayashi for deposition in San Francisco on November 13 and 14 if the Court chooses to do so.

Respectfully submitted

/s/ Brian A.E. Smith  
Brian A. E. Smith

BAS:mlm